

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RENEE MENARD)

Plaintiff,)

v.)

CIVIL ACTION NO. 03-12076 REK

IRON MOUNTAIN OFF-SITE DATA)

PROTECTION, INC., ARCUS DATA)

SECURITY, INC., RYDER TRUCK)

RENTAL, LTD., AND JORDAN)

KALEMRA, Alias)

Defendants.)

DESIREE ALLAIRE)

Plaintiff,)

vi.)

CIVIL ACTION NO. 03-CV-12566)
RWZ

JODAN KALEMRA, alias, a/k/a)

JODAN KALEMBA, RYDER TRUCK)

RENTAL, LT., RTRT, INC. in its capacity)

As trustee for the Ryder Truck Rental, Lt.)

RYDER TRUCK RENTAL, INC.,)

IRON MOUNTAIN OFF-SITE DATA,)

INC. f/k/a ARCUS DATA SECURITY,)

INC., JOHN DOES 1-5)

Defendants.)

SCOTT A. PETERS)

Plaintiff)

vs.)

CIVIL ACTION NO. 03-12495REK

JODAN KALEMBA, IRON)

MOUNTAIN OFF-SITE DATA)

PROTECTION INC., f/k/a ARCUS)

DATA SECURITY, INC., and)

RYDER TRUCK RENTAL, LT.)

Defendants)

DEFENDANTS', IRON MOUNTAIN OFF-SITE DATA PROTECTION, INC. f/k/a
ARCUS DATA SECURITY, INC., RYDER TRUCK RENTAL, LTD.
AND JODAN KALEMBA, MOTION TO COMPEL
THE PLAINTIFF'S, DESIREE ALLAIRE, ANSWERS TO INTERROGATORIES
AND RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS

The Defendants, Iron Mountain Off-Site Data Protection, Inc. f/k/a Arcus Data Security, Inc., Ryder Truck Rental, Ltd., and Jodan Kalemba ("Defendants"), hereby move pursuant to the Fed. R. Civ. P. Rule 37(a) and request that the Court issue an Order compelling the Plaintiff's, Desiree Allaire ("Plaintiff"), Answers to Defendants' First Set of Interrogatories and Responses to Request for Production of Documents. As grounds therefor, Defendants state that they have, in good faith, conferred with the Plaintiff in an attempt to obtain the outstanding discovery short of court action.

Defendants state that pursuant to F.R.C.P. Rule 33(a) and Rule 34, it served its First Set of Interrogatories and Request for Production of Documents to the Plaintiff on or about June 3, 2004. The Defendants have granted several discovery extensions to the Plaintiff, but still have not received any of the Plaintiff's discovery responses.

WHEREFORE, the Defendants, Iron Mountain Off-Site Data Protection, Inc. f/k/a Arcus Data Security, Inc., Ryder Truck Rental, Ltd., and Jodan Kalemba, respectfully request that the Court issue an Order compelling the Plaintiff's Answers to Interrogatories within seven (14) days of the date of the Order.

Respectfully submitted,
The Defendants,
Iron Mountain Off-Site Data Protection, Inc.,
Arcus Data Security, Inc., Ryder Truck Rental,
Ltd. and Jodan Kalembe
By their Attorneys,



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Heather E. Davies, BBO# 651739
McDonough, Hacking & Lavoie, LLP
6 Beacon Street, Suite 815
Boston, MA 02108
(617) 367-0808

DATED: November, 15th 2004

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing
pleading on all parties by mailing same, postage
prepaid, to all counsel of record.
Signed under the pains and penalties of perjury.

DATED: 11/15/04 HED